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Our Ref: 335-07/MEU/MAM

BY HAND

The Honorable Lewis A. Kaplan
 Daniel Patrick Moynihan U.S. Courthouse
 5000 Pearl Street, Room 1310
 New York, New York 10007

DEC 21 2007

Re: J.D.H. Int'l LLC v. Ocean Transport and Shipping, et al. 07-6274 (LAK)

Dear Judge Kaplan:

We represent the Plaintiff in connection with the above-referenced action. We write further to this Court's Order of October 11, 2007, directing the dismissal of this action unless, on or before January 9, 2008, Plaintiff files either proof of service on the Defendant or evidence that Plaintiff has attached property pursuant to the Process of Maritime Attachment and Garnishment (the "PMAG") previously issued in this matter.

On October 16, 2007, funds originating from Defendant Churchgate Nigeria Limited ("Churchgate") were restrained in the full amount authorized in the PMAG in the sum of \$199,772.76 at Deutsche Bank Trust Company America ("Deutsche Bank"). In accordance with Local Admiralty Rule B.2, on October 17, 2007, we provided notice of the attachment to Defendant Churchgate. That same day, we sent a cease and desist notice to Deutsche Bank and the other banks on which the PMAG had been served, requesting that no additional funds or assets of Defendants be restrained.

In November, we were contacted by non-party First Century International Limited ("First Century") which claimed that the bank in Nigeria which originated the wire transfer which had been restrained by Deutsche Bank had inadvertently identified the ordering entity as Defendant Churchgate instead of non-party First Century. Accordingly, First Century now claims it was the

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actual originator of the wire transfer which has nothing to do with Defendant Churchgate. We are currently investigating this claim. In the interim, we have recommenced service of the PMAG on the garnishee banks.

On October 17, 2007, upon receiving information that funds of Defendant Churchgate had been attached pursuant to the PMAG, we had attempted to serve Churchgate pursuant to Fed. R. Civ. Pro. 4(d), requesting a waiver of service of the summons, but Churchgate failed to respond. We are in the process of formally serving Defendant Churchgate in Nigeria, but this is proving to be a difficult and lengthy exercise. Accordingly we request the Court to allow an additional 90 days from January 9, 2008 to either complete service or advise as to the status of our efforts to serve.

We thank the Court for its courtesy and attention to this information and request.

Respectfully submitted,

FREEHILL HOGAN & MAHAR, LLP


Michael E. Unger


SO ORDERED

LEWIS A. KAPLAN, JUDGE

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